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15 Attorneys for Defendants
UBER TECHNOLOGIES, INC.
16 and OTTOMOTTO LLC

17 UNITED STATES DISTRICT COURT
18 NORTHERN DISTRICT OF CALIFORNIA
19 SAN FRANCISCO DIVISION

20 WAYMO LLC,
21 Plaintiff,
22 v.
23 UBER TECHNOLOGIES, INC.,
24 OTTOMOTTO LLC; OTTO TRUCKING LLC,
25 Defendants.

Case No. 3:17-cv-00939-WHA

**DECLARATION OF MICHELLE
YANG IN SUPPORT OF DEFENDANT
OTTO TRUCKING LLC'S
ADMINISTRATIVE MOTION TO
FILE UNDER SEAL PORTIONS OF
ITS MOTION TO EXCLUDE REPORT
AND TESTIMONY OF DR.
LAMBERTUS HESSELINK (DKT.
1926)**

1 I, Michelle Yang, declare as follows:

2 1. I am an attorney at the law firm of Morrison & Foerster LLP. I make this
3 declaration based upon matters within my own personal knowledge and if called as a witness, I
4 could and would competently testify to the matters set forth herein. I make this declaration in
5 support of Defendant Otto Trucking LLC's Administrative Motion to File Under Seal Portions of
6 Its Motion to Exclude Report and Testimony of Dr. Lambertus Hesselink (Dkt. 1926).

7 2. I have reviewed the following documents and confirmed that only the portions
8 identified below merit sealing:

Document	Portions to Be Filed Under Seal
Exhibit 1	Entire Document
Exhibit 2	Entire Document

13 3. The entirety of Exhibits 1 and 2 contain highly confidential information regarding
14 the technical specifications of Uber's LiDAR system. This information is not publicly known,
15 and its confidentiality is strictly maintained. I understand that disclosure of this information
16 would allow competitors and counterparties to acquire detailed knowledge of Uber's technical
17 designs, allowing them to tailor their own LiDAR development to the detriment of Uber.

18 4. Defendants' request to seal is narrowly tailored to the portions of Otto Trucking's
19 Motion and its supporting papers that merit sealing.

20 I declare under penalty of perjury that the foregoing is true and correct. Executed this 6th
21 day of October, 2017 in San Francisco, California.

22
23 /s/ Michelle Yang

Michelle Yang

ATTESTATION OF E-FILED SIGNATURE

I, Arturo J. Gonzalez, am the ECF User whose ID and password are being used to file this Declaration. In compliance with General Order 45, X.B., I hereby attest that Michelle Yang has concurred in this filing.

Dated: October 6, 2017

/s/ Arturo J. Gonzalez

ARTURO J. GONZALEZ